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Abstract

Recent work has called for more research to be carried out exploring how professional projects develop in conjunction with wider processes of institutional change. We respond to these calls here by analysing the way in which tax professionals have responded to a major disruption at the field level. The Organization for Economic Co-operation and Development's action plan on Base Erosion and Profit Shifting has proposed far reaching reforms in an attempt to bring corporate tax practice into line with changing moral boundaries in society. Through a combination of documentary analysis, participant observation and qualitative interviews, this paper shows how tax professionals negotiate changing moral imperatives. In doing so, the paper enhances our understanding of tax practice and contributes to extant literature on professionalization and institutional change in three principal ways. Firstly, we show how exogenous field-level changes afford professional groups opportunities for strategic repositioning. Secondly, we illustrate how different professional factions are differentially affected by processes of institutional change, distinguishing between in-house tax professionals and those working in public practice. Thirdly, we demonstrate how this strategic repositioning is made possible by the skillful deployment of the technical-cognitive resources of professional groups.

Keywords: Taxation, Corporations, Professionals, Institutional Change, Professionalization

Professional repositioning during times of institutional change: the case of tax practitioners and changing moral boundaries

Introduction

Recently, international taxation has attracted a growing level of attention from government policy makers who are concerned about the income shifting activities of multinational corporations. In particular, policy makers have expressed concerns about legal - but controversial - accounting practices such as transfer pricing¹ that permit income shifting to low tax jurisdictions. These concerns are especially pronounced where intellectual property is involved because of the difficulties associated with valuing intangibles. As a response to these concerns, in 2013 the Organization for Co-operation and Development (OECD) initiated its Base Erosion and Profit Shifting (BEPS) Action Plan, which is specifically directed at modernizing the international tax system (OECD: 2013)². The final BEPS package of 15 action items was released on October 15, 2015 for discussion by the G20 Finance Ministers (Appendix 1).

In addition to attracting the attention of government policy-makers, media revelations about the tax behaviour of several high profile multinational corporations have also antagonized the general tax-paying public. This is increasingly having an effect on tax practice that arises from outside the traditional tax system, potentially diluting some of the power wielded by tax executives identified in prior research (Mulligan and Oats, 2016). For example, in 2012, a UK consumer-driven Twitter campaign “Try Another Cup” targeted Starbucks for its efforts in

¹ While transfer pricing is a standard accounting technique which has importance beyond tax, over or understating transfer prices can shift income between tax jurisdictions resulting in a tax benefit.

² The BEPs initiative was the result of an increasing concern over the last decade of the tax avoidance activities of multinational enterprises and tax competition between states. The European Union was an early leader in this area with its “harmful tax” initiative. A criticism of the BEPs project is that it is not designed to provide meaningful change in the corporate income tax system but rather arose to appease societal concerns.

shifting income out of the UK to lower tax jurisdictions, propelling taxation to a prominent place on the corporation's CSR agenda (Shaheen, 2012). Ultimately, Starbucks responded to this public outcry in December 2015 by paying £8.1m in tax to the UK tax authorities, almost as much as it had paid to the same body in the previous 14 years combined (The Guardian, 15th December, 2015³). Starbucks was the symptom of a much larger malaise concerning tax transparency, tax avoidance and tax policy, issues that the OECD had been working on for several decades. After the systemic jolts caused by events such as the Enron collapse, the 2007-8 financial crisis and movements such as Occupy Wall Street, these tax issues started to become intelligible in the context of widespread mistrust of big business and financial institutions (see Appendix 2 for a timeline of key events in the development of BEPS). In part, this public ire over tax was fuelled by government investigations such as the US Senate's Permanent Subcommittee on Investigations examination of the tax activities of Apple. However, public interest was also motivated by extensive media questioning of the tax-paying behaviour of major corporations, coverage of which has increased significantly in recent years. In fact, the recent report of the International Fiscal Association (IFA, 2017) notes that several of the IFA branch reports (from the countries participating in BEPS) identified negative media reaction to multinational tax abuse as fuelling the OECD and G20 commitment to the BEPS process. Christians (2013) further highlights the way in which tax transparency advocates have mobilised the "peer pressure" effect that arises from the OECD community.

These developments have highlighted how the work of tax practitioners is socially consequential. As a result, we believe it is important to adequately conceptualize the work that tax practitioners do in the context of changing moral boundaries. Taking a theoretical approach in

³ Rob Davies, 'Starbucks pays UK corporation tax of £8.1m.', theguardian.com accessed 22nd September, 2015.

which tax is viewed as an institution and tax professionals as “morally significant actors” (Suddaby, 2013: 381), in this paper we use the case of BEPS to contribute to literature on institutional change and professional repositioning in three principal ways. First, we extend prior research that shows how institutional change affords opportunities for *organizations* to strategically enhance their position within fields (Kodeih and Greenwood, 2014). We show here how institutional change affords *professional groups* similar opportunities in line with DiMaggio (1991). Second, we examine the reciprocal relationship between institutionalization and professionalization as suggested by Suddaby and Viale (2011). Specifically, Suddaby and Viale (2011) call for more research that draws attention to the way in which field-level changes impact differentially upon different professionals. We respond directly to that call here by showing the ways in which corporate in-house tax professionals and their external tax advisors conceive of BEPS in quite different ways. By extension, we explore the symbolic boundaries (Lamont, 1992) that these two professional factions draw in order to distinguish themselves from each other. Third, we illustrate the ways in which professionals use technical-cognitive resources in skillful ways as part of an overarching attempt to enhance the professional project of tax. Specifically, we show how tax accountants exhibit “entrepreneurial social skill” (Suddaby et al, 2016: 228), adapting their technical expertise to reflexively mediate between organizations and the wider court of public opinion in ways that are beneficial to themselves.

The remainder of the paper is structured as follows. In the following two sections, we examine current tax research and argue that wider literature on transnational governance and institutional change offer fruitful ways via which to frame current tax practice and different groups of tax professionals. A subsequent section outlines in detail the BEPS project and considers its main objectives. We then outline the research methods employed in the study. The findings are then presented in accordance with the various ways in which in-house tax

professionals and those who are external advisors are seen as responding to BEPS. Finally, we discuss the main contributions that our analysis permits us to make and conclude by suggesting directions for further research.

Tax as a social practice

One readily identifiable stream of tax literature identifies the attitudes and dispositions of individual taxpayers, largely theorising these from psychological or behavioural perspectives. Such work might, for example, explore the ethical beliefs and social norms that shape tax compliance or avoidance decisions (Alm and Torger, 2011; Blanthorne and Kaplan, 2008; Kaplan et al., 1988; Kirchler et al., 2006; Shafer and Simmons, 2008, 2011) or look at the roles of trust, persuasion and cooperation in tax compliance activities (Murphy 2004, 2008). Further work explores the specific relationship between Corporate Social Responsibility and aggressive tax planning, hotly debating whether the two go hand in hand or not (see, for example, Dowling, 2014; Muller and Kolk, 2015; Lanis and Richardson, 2013; Ylonen and Laine, 2015).

A second readily identifiable stream of research on tax, often to be found in the wider social sciences rather than in the accounting literature, views tax more as a social practice, deeply embedded within wider socio-economic structures and with welfare implications (Carter et al., 2013; Martin, 2015; Morgan and Prasad, 2009; Palan et al., 2010; Roberts and Bobek, 2004; Sikka & Willmott, 2010). Regulation is a recurring theme in this stream of literature, with Genschel and Schwarz (2011) also highlighting the way in which countries engage in “wasteful competition for mobile economic assets and activities through tax reductions” (339). Relatedly, a number of studies have looked at the interactions between various combinations of taxpayers, tax advisors, tax authorities and tax lobbyists in order to reveal the politically contested nature of the

tax terrain (Addison and Mueller, 2015; Currie et al., 2015; Gracia and Oats, 2012; Kentikelenis and Seabrooke, 2017; Seabrooke and Wigan, 2016).

Overall, there is a growing body of social science looking at tax, which has helped to shed light on individual approaches to tax behaviour as well as situating tax within wider social science frameworks. However, each of these broad approaches to tax research has its deficiencies. Literature looking at tax from a psychological or behavioural perspective ignores wider social structures and influences as well as evincing a reluctance to engage tax practitioners directly and elicit their own viewpoints on major institutional initiatives. Literature depicting tax as a social practice is much better in terms of highlighting the ways in which tax behaviour is enmeshed with wider organizational, institutional, political and societal phenomena, but tends to adopt a more macro perspective, telling us little about what tax actors are actually doing on the ground, how such actors understand what they do and whether they might be able to act otherwise.

In order to understand how tax actors are responding to manifest societal disquiet over corporate tax avoidance and major international initiatives such as BEPS, another approach is required that can bridge aspects of structure with aspects of agency; firstly, tax needs to be conceived firmly as a social practice, paying attention to the way in which everyday tax practices are interwoven with societal, institutional and political norms and pressures; secondly, engagement with tax actors directly is of paramount importance if we are to understand how such norms and pressures successfully infiltrate or otherwise impact the world of taxpayers and their advisors.

Studies more in this vein include Boll (2014), Morrell and Tuck (2014) and Mulligan and Oats (2016). For example, Mulligan and Oats (2016) usefully identify the powerful role that tax executives play in shaping the external tax environment, subtly exercising their power at micro,

meso and macro levels. Boll (2014) focuses on the actual tax practices of people within organizations, characterizing tax as a “distributed action” (293), meaning that tax behaviour cannot be understood by reference to the individual viewpoints of tax actors alone but needs to be understood in the context of the wider network relations within which actors find themselves. Morrell and Tuck (2014) show the importance of dominant plots in assisting accounting professionals in making sense of tax’s complex governance environment. They provide a more nuanced perspective in understanding the relationship between corporate taxpayers and tax authorities by highlighting that corporate taxpayers are not simply ‘villains’ but must make decisions in a complex environment, an environment where tax authorities often implausibly cast themselves as false ‘heroes’.

The above studies usefully attempt to integrate individual experience (agency) with wider external pressures (structures). Moreover, they do so in a way that embraces the complexity of tax practice and its surrounding institutional environment. However, a number of limitations characterise such work. Firstly, empirically, the datasets from which these studies are drawn are limited in terms of what they might tell us about current tax practice. Mulligan and Oats (2016) draw on data from 2005 and Morrell and Tuck (2014) on interviews undertaken between 2001 and 2007. Initiatives such as BEPS and recent shifts in public opinion suggest that tax practice might have moved on since these times. Mulligan and Oats (2016) focus primarily on in-house tax professionals rather than those working in public practice and therefore offer limited insights into the ways in which institutional change differentially impacts upon different professional factions (Suddaby and Viale, 2011). Additionally, Boll’s (2014) study draws from a limited sample of 12 carpenters, plumbers, bookkeepers and restaurateurs, a far cry from the higher profile world of large corporations and Big 4 tax advisers that the BEPS discourse is targeting.

Tax professionals as reflexive agents

The above review of the literature suggests that more empirical work looking at the experience of tax professionals, both in-house and externally, to these recent institutional and societal changes is therefore necessary. Such work is important because it can enhance our understanding of how professional groups attempt to reposition themselves during times of institutional change.

DiMaggio's (1991) classic work on museum professionals described this professional group as skilful social actors who exhibited a "dual consciousness" (268), operating conservatively at the organizational level while initiating field-level changes that served to enhance their own status.

Thus, professionals often acquire both an awareness of their institutional environments as well as "a degree of skill or competence in managing or manipulating that environment" (Suddaby, 2013: 383). Suddaby et al (2016) elsewhere describe this awareness of the constraints and opportunities present in surrounding social structures, and the ability to skilfully take advantage of these, as 'reflexivity'. For example, museum workers in the US in the early 1900s were successful in shaping the institutional environment within which they operated in their own image, creating field-level organizations that encouraged an understanding of art as something for the consumption of the general public rather than the privilege of societal elites (DiMaggio, 1991). In this respect, the museum professionals used public welfare and education arguments to consciously⁴ enhance their own position and status as key buffers between their organizations and

⁴ It is worth nuancing this, as some professional actors consciously do the work at the level of the organizational field that leads to enhanced status, while others express little social skill at the organizational level, merely taking advantage of the field level shifts that are enacted by a minority of professional actors (DiMaggio, 1991: 288). Greenwood et al (2017) also note that different actors will exhibit different degrees of strategic behaviour in situations of institutional complexity, suggesting that individuals can be positioned on a continuum of embedded discretion. Overall, therefore, some actors will be more conscious of attempts to enhance professional projects, while others will less consciously reap the benefits of such strategies. It is not always possible to distinguish the one from the other.

the wider institutional environment within which they operated (McPherson and Sauder, 2013). In Bourdieusian terms, they reflexively displayed a ‘private interest in the public interest’ (2005). For the purposes of the present study, it would be of interest to know to what extent tax professionals are taking advantage of changes in their institutional environment to enhance their own professional position, potentially using morality as a symbolic resource in the same way as DiMaggio’s (1991) museum professionals did in the early 1900s. Suddaby (2013) notes that professions are often at the forefront of diffusing practices that are seen to be right and proper.

Suddaby and Viale (2011) build upon DiMaggio’s (1991) work by describing professional projects as endogenous mechanisms of institutional change. That is, professional groups are constantly altering organizational fields and institutional environments through their actions in ways that affect other groups, but also in ways that alter their own position within the social space more broadly. One key resource that professionals draw upon in order to position and reposition themselves in the social space is, according to Suddaby and Viale (2011), social capital, or what Fligstein (2001) refers to as ‘social skill’ or ‘the ability to engage others in collective action’ (106).

We suggest that, in addition to social skill or social capital, that professionals also draw upon their resources of technical expertise in order to endogenise institutional change. This might be particularly true of tax professionals whose work is often highly complex, involving multiple cross-border transactions that take place within the context of opaque and contested regulatory environments. Unlike other financial professionals such as auditors whose careers tend to advance by becoming entrepreneurial deal makers and distancing themselves from the realm of technical work which is delegated to subordinates (Spence and Carter, 2014), tax accountants continue to deliver technical briefs even during advanced stages of their careers. The complexity of tax practice is such that tax professionals can be seen in the vein of Viale et al (2017) as

“holders of crucial know-how” (p.26). Therefore, understanding how tax professionals employ their technical and cognitive resources can reveal the extent to which technical expertise is successfully deployed in processes that confer group advantages (Power, 2003; Suddaby et al., 2016). In attempting to understand this, our approach responds directly to a recent call by Viale et al (2017):

“[T]here is a dramatic need for more studies analyzing resources embedded in the social skills of professionals and experts, and the role of these resources in the constitution of professional boundaries” (p.30).

In particular, it is of interest to explore the ways in which the technical-cognitive basis of tax work adapts to, or resists, the introduction of new moral imperatives into the tax field. In institutional terms, the introduction of a new moral ‘logic’ into the tax field potentially conflicts with a well-established commercial ‘logic’ of tax minimisation, thereby exacerbating a pre-existing institutional complexity within the field. Recent work on institutional complexity points out that “[m]ore work is needed to unpack how local actors mediate institutional demands and the requirements of day-to-day organizational activity” (McPherson and Sauder, 2013, p.166). The present study responds to this by looking at how tax professionals seek to take advantage of institutional complexity through the reconstitution of professional boundaries.

Additionally, existing tax research has failed to keep pace with wider developments in governance and regulation that now assume an essentially transnational nature (Arnold, 2005; Suddaby et al, 2007). In various spheres, from accounting regulation to forestry certification, there has been noted an “increasing formalization, structuration, codification, standardization and depersonalization of the rules of the game in the transnational space” (Djelic and Quack, 2003: 5). These developments have witnessed the State become displaced as the main actor of regulation, instead being one among many and an increasing role of epistemic communities with

shared interests and expertise, such as professional groups (Djelic and Sahlin-Andersson, 2006).

A key aspect of this shift to transnational governance is the increasing significance of ‘soft law’ instead of binding regulation. Bodies such as the OECD, who can be understood as one of the most important post-war transnational organizations (Djelic and Quack, 2003), need to be understood in this context, as ‘agenda-setters’ rather than regulators per se (Jacobsson and Sahlin-Andersson, 2006). The degree to which the BEPS project represents a very significant extension of transnational governance, cannot be overstated. In this regard, the International Fiscal Association notes that:

The BEPS project has witnessed the transition of global tax governance from the OECD’s province of the developed north to global fora, wherever those fora may be housed institutionally (IFA, 2017: 21).

For this reason, the BEPS project serves as an ideal context within which to explore how tax professionals respond to this wider shift towards transnational governance, perhaps exploiting the declining role of the nation-state in various ways in order to position themselves more strategically in the market for transnational corporate tax advice. Extant research on tax, which has only begun to view tax as a social practice, has yet to situate tax professionals and the advice that they disburse within transnational parameters. Such an intellectual enterprise is essential if we are to understand how tax professionals, both in-house and externally, operate in the first instance, and how they might be more effectively regulated in the second.

In summary, although emerging research has begun to view tax as a social practice, there is a tendency for this literature to empirically privilege either the micro level activities of the tax practitioner or the macro context of the politico-regulatory structures within which tax practices are situated. More work could be done that simultaneously considers the extent to which tax professionals both shape and are shaped by their institutional environments. The present study seeks to do just this and, in so doing, purports to make a number of contributions to literature on

the professions and institutional change. Firstly, we demonstrate the way in which individual professional groups take advantage of/actively create institutional change in order to enhance their own position in the social space. Kodeih and Greenwood (2014) point out that institutional change affords *organizations* opportunities to strategically and intentionally enhance their position within organizational fields. We focus here on *professional groups* rather than organizations per se and thus draw attention to the way in which institutional change – in the form of both changing moral imperatives at the societal level and BEPS related initiatives at the field level - and professional projects co-evolve. Secondly, we draw attention to the way in which professional groups are internally divided and how those divisions – e.g. between in-house tax professionals and their external advisors - can become more demarcated during times of institutional change. This follows on directly from Suddaby and Viale's (2011) call for more research "that addresses the various ways in which field-level processes of institutionalization attend to some characteristics of individual professionals and not others" (431). Differences between different professional factions might be evident from the different demands or opportunities that institutional pressures for change create for each, or from the symbolic boundaries (Lamont, 1992) that one professional faction might articulate between themselves and the other professional faction. Thirdly, we explore the ways in which technical-cognitive resources are mobilised and enmeshed with moral imperatives as part of professional repositioning projects. This extends Suddaby and Viale's (2011) work which emphasises the importance of social skill in advancing professional projects.

BEPS and 'soft' law

As noted earlier, the BEPS project represents one of the most far-reaching and dramatic developments in transnational governance in recent history. In developing the project, the OECD

expressly sought to include non-members in the process in order to enhance the legitimacy of the outcomes. In total, 100 different jurisdictions, accounting for 93 percent of the world's Gross Domestic Product, are now included in the process (OECD, 2017). That this was a remarkable success in promoting transnational governance can be seen in the comments of the International Fiscal Association in its recent analysis of the BEPS project. Drawing on reports from its branches based in the BEPS participating countries, the IFA concluded that the project represented a shift in tax governance from the OECD itself to a set of truly global fora (IFA, 2017).

The BEPS project seeks to provide an internationally accepted moral basis for appropriate sharing of tax revenues between countries. This is an explicitly normative agenda. According to the OECD

addressing BEPS is critical for countries and must be done in a timely manner, not least to prevent the existing consensus-based international tax framework from unravelling, which would increase uncertainty for businesses at a time when cross border investments are more necessary than ever. (OECD 2014d: 3)

We provide an overview of the BEPS Actions measures in Appendix 1 and a summary of the key dates and events in the elaboration of BEPS in Appendix 2. Here, it is sufficient to note that the objective of BEPS is to change both the way that multinationals and tax professionals think about tax planning, and the ways in which sovereign governments implement and enforce tax policy. Such objectives are evocative of Suddaby and Viale's (2011) contention that professional projects are now more closely interconnected with transnational arena than with initiatives arising at the level of the nation-state.

Questions remain, however, about the extent to which the OECD can force sovereign nations to follow newly developed norms and, in turn, whether it can truly disrupt entrenched tax minimisation logics. As an agenda-setter rather than a regulator (Jacobsson and Sahlin-

Andersson, 2006) the OECD has no formal authority to institute or enforce rules in any sovereign nation. However, this is not to say that the OECD did not have regulative intent in the BEPS project, merely that it relies on its authoritative expertise rather than its ability to implement sanctions. In fact, legal scholars have noted that the OECD exercises a form of ‘soft law’, whereby nations comply with OECD guidance by expectation rather than by legal obligation (Christians, 2007). Consistent with this observation, the OECD expressly stated in its BEPS reports that it anticipates that national governments will implement the proposals of the BEPS project via domestic tax law:

They are soft law legal instruments. They are not legally binding but there is an expectation that they will be implemented accordingly by countries that are part of the consensus. (OECD 2015a: 5)

The ostensibly soft law nature of BEPS notwithstanding, membership of the OECD and participation in the BEPS process carries with it certain expectations, including compliance with the BEPS directives⁵. Of particular interest is the adoption of minimum standards, the very rhetoric of which is strongly suggestive of regulative action. With regard to enforcement, the OECD’s FAQ document directly addresses this issue through the issue of monitoring:

Monitoring the implementation of the BEPS measures includes targeted monitoring of the minimum standards on treaty shopping and on dispute resolution, the application of the criteria on harmful tax practices as well as the implementation of the country-by-country reporting requirements. Monitoring will also focus on what countries have done to implement the BEPS recommendations and the measurement of the impact of BEPS and BEPS countermeasures. (OECD 2015a: 6)

⁵ In the final BEPS package all OECD and G-20 countries have committed to minimum standards in four areas; treaty shopping, country by country reporting, fighting harmful tax practices, and improving dispute resolution. In addition, in the areas of tax treaties and transfer pricing existing standards have been updated and in the areas of hybrid mismatch arrangements and interest deductibility countries have agreed on a general policy direction. Finally, in the areas of mandatory disclosure initiatives and controlled foreign corporations the package provides guidance on best practices (OECD, 2015a).

This regulative impetus is further evident in the BEPS *Action 15: Develop a Multilateral Instrument* (OECD 2014c: 17). The report on Action 15 is directed at creating one single instrument that would override all current bilateral tax treaties between countries; in essence, countries adopting the treaty would have forfeited, on some level, their own tax sovereignty, implying that transnational pronouncements often take precedence over national initiatives (Suddaby et al, 2007). On June 7, 2017, some 67 countries signed this instrument and others are expected to join in the coming months (OECD, 2017).

While provisions such as these point to how BEPS displays a regulative intent, a closer examination of these provisions also reveals a strong moral basis behind their design and function. As noted by the IFA “[n]one of the minimum standards affected substantive tax law rules, which were relegated to recommendations and best practices” (2017: 34). The minimum standards involve developing new review processes (administration), treaty provisions consistent with existing provisions of many countries and mechanisms for effective and timely resolution of disputes (both treaty practice). Even where new laws are introduced, such as in the case of country-by-country reporting requirements, these relate to improved transparency through greater disclosure, not changing existing tax laws. Therefore, while BEPS is clearly having regulatory consequences, it also relies upon the moral cajoling of both countries and corporations.

While, on the one hand, BEPS implies a loss of State power, on the other there is evidence that individual States will continue to act opportunistically, albeit under the guise of enhancing global welfare. For example, the International Fiscal Association (2017) report identifies significant differences between countries with respect to their views on BEPS outcomes. Of particular interest is the IFA’s observation that countries most supportive of BEPS are the OECD’s core members. The IFA suggests that these countries “viewed BEPS as a means of ‘coaxing (with the leverage of peer pressure) other countries to replicate their own domestic

policy preferences” (p. 19). This interpretation of BEPS is quite different from the more harmonious global consensus perspective being promoted by the OECD (see for example, OECD, 2017).

What does this all mean for individual tax professionals? Overall, the BEPS initiative has instigated a series of imperatives that seek to disrupt the way in which corporate tax practice is undertaken. There are clearly regulative imperatives in the form of proposed changes to laws and mechanisms outlined to enforce these. Beyond regulation, there are also normative imperatives directed at changing the moral standards as to what constitutes legitimate tax practice. It is in this respect that the transnational project of BEPS comes into direct contact with the professional project of tax, which has grappled with the meaning of the morality of tax minimisation for many decades. For example, Christians (2013) notes one leading executive is on record as stating that “morality has entered the tax lexicon” (p. 297) as far back as 2006. Anecdotally, the OECD (2017) asserts that there is evidence of increased board oversight of tax planning activity and that multinationals are responding to BEPS by “changing the nature of their tax planning arrangements to ensure alignment between the location of their value-creating activities and the location of profits for tax purposes” (p. 6). This shift in thinking is precisely what BEPS hopes to promote.

However, in spite of this attempt to provide greater clarity in what has hitherto been an incredibly complex space, the BEPS initiative has not reduced the room that tax professionals as a whole have for manoeuvre. Not only have tax professionals been involved in the elaboration of BEPS itself at the field level, at the organizational level they find themselves as key mediators between their organizations and society *per se* (McPherson and Sauder, 2013). Further, as Power (2009) notes, rules-based systems provide greater cognitive comfort for professional actors, so it is unclear whether practitioners will embrace the new way of thinking proposed by BEPS –

which is, at least in part, principles based - or will simply revert to superficial compliance with the rules. Either way, the BEPS project presents us with an ideal opportunity for increasing our understanding of tax as a social practice and for identifying the ways in which tax professionals as reflexive actors respond to transnational institutional change.

Methods

In studying tax professionals as institutional actors, we employ multiple methods (Muzio and Faulconbridge, 2013) to analyse the field in which they operate and how institutional changes within the field - such as greater scrutiny by the public and government policy-makers and actions such as the OECD's BEPS action plan - have disrupted tax practice. We engaged practitioners directly by conducting semi-structured interviews in four countries; Canada, the United States, the United Kingdom and China. In total, we conducted 32 semi-structured interviews with tax professionals working either in public practice or as in-house tax and finance executives, with one interviewee working for a national tax authority. 16 of these interviews took place in Canada, 11 in the US, one in the UK and four in China. These interviews included a follow up interview with one of our interviewees from a Big 4 firm to update our understanding of reactions to recent BEPS developments and the role and influence of tax professionals in constructing the final BEPS recommendations. The sample contains a balance of in-house tax professionals working in corporations and external advisers working in public practice, thus permitting insights to be drawn regarding the differential impact of institutional change on professional sub-groups (Suddaby and Viale, 2011). Canada and the US were chosen as the primary empirical sites of the study because of the institutional differences between the two in terms of tax, and also because they share significant cross-border trade. The UK interview was done with a US subsidiary and so essentially forms part of the US sample. China was also chosen

for a limited number of interviews specifically because it is a non-OECD country, albeit one that attracts significant Foreign Direct Investment, and would provide some insight into how far reaching the BEPS initiative actually is.

Our interview dataset covers tax professionals working in public practice and in-house in companies of various sizes and industries including companies in the business to business and the business to consumer spaces. Speaking with in-house tax professionals, in addition to those in public practice, provides highly relevant insights since these individuals have been shown to shape tax law and practices (Mulligan and Oats, 2016). Our interviewees were senior tax people in their organizations and included Vice-Presidents, Directors of Tax, CFOs with tax backgrounds in industry and Partners in public practice. These individuals had contact with senior executives and board members in their organizations or client firms, indicating that the tax function was often seen as a source of power and status within the organization (Mulligan and Oats, 2016). Characteristics and background information regarding interviewees and their organizations are outlined in Table 1.

Please place Table 1 here

This table presents information on interviewees and their organizations at a high level to disguise the identity of participants. The world of tax professionals is relatively small in comparison with, say, that of auditors, so greater detail might reveal the identities of participants, contravening both research ethics and assurances provided to participants.

The interviews and participant observations took place between September 2013 and August 2015, a period during which BEPS was taking shape and companies were confronted with new and uncertain realities surrounding tax planning. The interviews allowed us to directly

understand how tax professionals experienced these new realities and constructed responses to them in an increasingly uncertain environment. An interview guide was used to direct the discussion and ensure consistency between the interviews as all authors were involved at various points in the process. Interviews explored a number of issues regarding the changing tax environment, including interviewees' views on BEPS, the role of social responsibility in tax, interviewees' perceptions of changes in their role or nature as tax professionals, organizational responses to these issues, changes to organizational tax planning and compliance processes, and relationships with local and international tax authorities. In broad terms, the interview guide permitted exploration of the way in which BEPS was impacting upon tax practice and how tax practitioners themselves, as individuals and as a group, were responding to various BEPS-related imperatives. Interviewees were probed to give specific examples of how their own work had changed in recent years and interviewers were particularly concerned to explore the extent to which tax professionals' daily activities were more or less influenced by emerging and growing moral pressures from various quarters.

These interviews were informed by our examination of a broad range of empirical material (Appendix 3), which allowed us to capture a wider understanding of the institutional environment tax professionals navigate. This material also provided an important background and context against which to conduct our interviews and assess the interview material. We began by analysing the emergence and evolution of BEPS, beginning with the OECD's initial report on Base Erosion and Profit Shifting issued on February 12, 2013 (OECD, 2013). This analysis provided a useful starting point to both engage with tax professionals and appreciate early expectations of shifts within the tax environment. During the period over which we conducted and analysed the interviews, we continually monitored the institutional environment surrounding BEPS and broader public concerns over the taxation of multinational companies.

During the study period, newspaper and tax practitioner journal articles were collected and examined to understand how BEPS and public concerns over tax responsibility more generally were changing the environment. Tax is an evolving body of knowledge and tax practice is influenced by political dynamics. These articles provided insight into public, government and corporate responses to recent tax issues and captured important interactions between these various groups over time. Additionally, more quantitative data sources in the form of surveys conducted by Deloitte (2014a, 2014b, 2015) were examined to corroborate and validate our interview data. Survey respondents included firm clients and contacts, numbering almost 600, from over 15 countries. Survey questions examined areas such as reputational and governance concerns, development of organizational policies, impact on Boards of Directors, scrutiny and relations with tax authorities, changes in business operations, anticipation of legislative changes, and impact on the organization including its tax burden. Finally, two of the authors attended conferences and symposiums on BEPS at which speakers included tax partners, tax professionals and government officials, totalling 35 hours of participant observation. Attending these BEPS-related conferences was very important in terms of understanding the collective sense of just how much BEPS is perceived as constituting a disruption to tax practice, as well as in highlighting the different symbolic boundaries that are drawn publicly between in-house tax professionals, external tax advisors, State actors and those working for the OECD itself.

Professional repositioning in times of institutional change

1. Reacting to BEPS

In spite of recent disruptions to tax practice in the form of heightened public and regulatory concern over the tax strategies of corporations, many professionals continue to see their role as

pure tax minimization while remaining within the letter of the tax law. One US interviewee stated the case quite clearly as follows:

the company's job is to keep as much of its own money as possible ... it should pay as little tax as possible without evading the law but within the means of whatever risk profile the company has for grey areas and therefore it's the tax VP's job to make sure that that happens and therefore it's my job to help that tax VP ... (P30, Tax Partner, 2015)

There was a strong aversion to any suggestion that the tax professional think of tax minimization outside this framework and there was a sense that “doing the right thing” translated into compliance with the letter of the law. Many professionals felt it was the role of the government to make the laws and tax professionals simply had to remain on correct side of those laws. For example, another professional expressed frustration with any expectation to think beyond legal compliance.

What does that mean – volunteering tax? You can't function as a company – like our mission in our company is complying with the laws. You know, like be in full compliance with the laws. Don't dick around and we tend not to, we don't believe we dick around. In fact, our history, you know, when a government has half challenged us and we've gone to court we don't lose very often and that's not because we are sneaky lawyers and we've done fancy tricks. It's because whatever those laws were, we did follow them and we were compliant. (C4, Tax Executive, 2014)

By constantly emphasising the need to comply with laws, tax professionals as a whole understand tax mainly as a rule driven process, with governments responsible for establishing the rules⁶, individual and corporate taxpayers responsible for following the rules, tax authorities responsible for ensuring the rules are followed or handing out sanctions for the failure to follow rules, and courts to adjudicate disputes over interpretation of the rules.

Rules therefore provide a compass for guiding tax professionals in their day-to-day activities. In fact, tax professionals see their duty as following the rules established by the state

⁶ Mulligan and Oats (2016) describe how the process to develop tax rules is subject to intense lobbying by multinational enterprises and tax advisors.

irrespective of whether they agree with those rules or not:

Some may not like that a red light means that you've got to stop, you know, but that's what you've got to do, you've got to stop at the red light. I think you do have a moral duty, as an American citizen, you have a responsibility to pay the tax under the system that we have. (P21, Tax Partner, 2014)

Interviewees argued that social responsibility within tax was the responsibility of governments who establish the tax rules. Interviewees continually emphasized that current concerns over social responsibility within tax are traceable to the failure of governments to establish appropriate rules. In particular, they pointed to the need for regulatory solutions and actions on the part of governments to enforce regulations.

So I get very annoyed by all this socially responsible business because tax is not up to tax payers. It is up to the governments to set the law. So the media should be directing their ire and their concerns at governments, not at large corporations. (C14, Tax Executive, 2015)

Aggressive tax planning was perceived by corporate interviewees as a product of Big 4 accounting firms aggressively trying to make a market. For example, the following interviewee reflects back on the environment of the 1990s when Arthur Andersen were still in business:

Accounting firms, particularly with sort of the Arthur Andersen move in like it was the mid-90s that they really began to turn [aggressive tax planning] into a business in a major way and focus on it and drive a pile of money on it. That to me was not a helpful development....Like I think that's done a real disservice to sort of the whole practice of tax and tax communities and, again, the accounting firms would just go – they would be really mad at me to hear me say that but I've seen it. I've seen way too many – they come around here and try and sell some stuff and I look at them and I go I can't believe you are selling this...It stinks and if everyone did it there would be no revenue left in Canada. (C4, Tax Executive, 2014)

Another interviewee, now an in-house tax advisor but previously in public practice, offers similar reflections, emphasizing the ways in which tax professionals have taken advantage of complexity in tax legislation in order to push tax aggressiveness as a self-serving agenda:

I think it is probably more relevant to look at my fifteen years that I was in public practice and seeing some of the ideas and some of the scenarios that were bantered about and some of the plans that were very popular and put into place and, quite frankly, I had difficulty with a lot of the things that were being promoted because, and it's not so much even that I thought they were morally wrong, I mean I just didn't think that that was the intent of some of the legislation. I don't think some of the products that were resulting from the interpretations were necessarily in line with what was the right, if you will, the right thing to do. (C2, Tax Executive, 2014)

This interviewee, and others, describe a situation in which, starting from the early 1990s, tax professionals in (then) Big 5 firms essentially took advantage of byzantine tax rules in order to institutionalise a set of practices within multinational corporations that created additional high-value work for themselves. Indeed, even in today's climate of increased public scrutiny over tax planning, those working for external advisory companies continue to espouse more legalistic views on what is acceptable and what is not:

So there are sometimes, and it's both in the media, but I've heard it occasionally from the tax authorities as well, people shouldn't be doing aggressive tax planning. I have no idea what that means. So either something is compliant with the law or it's not compliant with the law. We know what tax evasion is and we're not there, but beyond that what does aggressive tax planning mean? (P7, Tax Partner, 2014)

In this respect, external advisors often seem to be much less intimidated by the BEPS pressures than their in-house counterparts, and more focused on the need to help their clients meet the new requirements. Presumably this in part reflects the business opportunity presented by BEPS (which is certainly corroborated by the large amount of BEPS related promotional material now produced by Big 4 firms) whereas in-house tax professionals often express a real concern with regulatory compliance, whether BEPS related or not:

I think the one thing it's hitting us is with this new compliance stuff which is going to drive us all nuts. It's, again, which I don't think is going to be productive towards their goals but it's going to put a burden on everybody to try and get them this data that's going to make us so-called transparent and I think we are all really concerned about that. Like the ask for this stuff is going to be so huge but I'm not sure, you know, that train has left the station. (C4, Tax Executive, 2014)

Many in-house tax professionals wanted greater regulatory clarity, particularly in multijurisdictional situations where many tax professionals fear that tighter tax rules at the country level will lead to situations of double taxation. These in-house tax professionals expressed concerns that BEPS may not simply clarify rules but lead to even more rules, resulting in an even greater compliance burden, particularly *Action 13: Guidance on Transfer Pricing and Country-by-Country Reporting* (OECD, 2014b) requiring country by country reporting. Tax professionals tended to agree that they were more than willing to comply with such requirements but were clearly concerned how they might get such information since in some cases multinationals could have thousands of corporate entities.

Overall, tax professionals as a whole are not of the view that the recent BEPS initiative has reduced complexity in professional work: they require high amounts of technical expertise in order to navigate and interpret the myriad rules that govern tax practice. Further, some expressed the view that this complexity has actually increased as a result of BEPS, thereby creating more opportunities for tax professionals in public practice. Moreover, many tax professionals exhibit a primordial view that laws and regulations provide the moral boundaries of what they do: provided they stay within the law, they are OK. In this respect, it is clear that a logic of tax minimisation persists in the minds of tax practitioners in spite of recent attempts to introduce alternative logics into the field of tax. However, this is not to say that moral logics have failed to gain any traction at all amongst tax practitioners. On the contrary, as we shall see below, there are emerging aspects of tax practice which suggest a more active embrace of moral concerns.

2. Risk and 'the effective tax rate'

Though some wedded themselves to a strictly legalistic view of corporate tax responsibilities, tax

professionals were increasingly likely to incorporate extra-contractual or extra-regulative views into their frames of reference.⁷ This illustrates how institutional actors are often forced to act in economically non-rational ways, embracing social rather than economic pressures (Suddaby, 2013). For example, interviewees emphasised the need to be aware of public reactions to their activities, indicating a tension between legal tax minimization strategies and public perceptions concerning what is an appropriate amount of tax for a company to pay. This balancing act between different logics (commercial, regulatory and moral) is well encapsulated in the following quote:

The million-dollar question is well what is the threshold? How much is that? Obviously, there is no right line. That is a subjective question. Obviously, the taxing jurisdictions are going to have a much higher standard than the companies themselves and it's a matter of both parties coming together...I think there is a greater standard above and beyond 'we are following the letter of the law'. (C24, Tax Executive, 2014)

This interviewee outlines essentially three different positions regarding 'appropriate tax levels'. There is the view of the company (encapsulating a commercial logic), the view of the taxing jurisdiction which is perceived as setting a higher threshold (encapsulating a regulatory logic) and also something vague that exists beyond the letter of the law (encapsulating a moral logic). This balancing act is not restricted to tax professionals from OECD countries either, as the following quote from a Big 4 tax accountant in China confirms:

Because of BEPS clients have more and more uncertainty and they need to deal with lots of countries so we understand that aggressive tax planning is not...I would say it's not valid anymore. So we also need to help our clients achieve certainty. (P17, Tax Director, 2015)

Essentially, the global nature of tax transactions means that even countries outside of the OECD's remit are falling into line with the normative stance articulated by BEPS. This leaves tax

⁷ The interviews supported the majority of tax practitioners taking a legalistic interpretation of their corporate tax responsibilities, tempered by a moral perspective.

professionals, especially in-house professionals, to be the mediators (McPherson and Sauder, 2013) or buffers (Barley, 1996) between their organisations and the wider public. Indeed, some tax professionals now saw their role as keeping their organization out of the newspapers:

Starbucks was a good example. What they did from a tax perspective was all above board, it was fair and they used losses. There was nothing against the law there but the perception by the public was poor and it potentially made it difficult on sales, right. They are risking public perception, even though they were correct from a tax point of view. (C10, Tax Executive, 2014)

This increasing sensitivity to public perceptions and expression of a need to “adopt practices assumed to be right or proper” (Suddaby, 2013: 381) over and above legal prescriptions was seen by many as a strategic necessity rather than a clear moral position *per se*. This was particularly true of consumer facing companies with well-known brands. Moreover, such views tended to be expressed more by in-house tax professionals than their external advisors, although advisors understood very clearly the needs of their clients to protect their reputations. Indeed, whenever external tax advisors would seemingly espouse a position that was beyond a ‘nexus as contracts’ view, this tended to be associated with their clients rather than themselves:

I’ve never been part of a tax planning conversation in the last 4-5 years that didn’t involve economic substance, how is this going to be perceived, the newspaper test, and just the discussion about is this generally a responsible and substantive thing to do in addition to weighing the technical merit. So I’ve absolutely seen a shift (P30, Tax Partner, 2015)

This tension between public perceptions and tax minimisation illustrates how moral imperatives actually represent an opportunity for in-house tax professionals to play a more prominent role in corporate decision making. They do so through the calculation of, and adherence to, what are referred to in the tax field as ‘effective tax rates’⁸. Persistent references were made by

⁸ In many cases, corporations start with the effective tax rate that they want to achieve, instead of structuring their tax affairs to achieve the lowest effective tax rate. Interviewees often referred to the importance of ensuring that their effective tax rates were within an industry range.

interviewees to an effective tax rate norm. This did not mean that a corporation should necessarily have a high effective tax rate but simply that the corporation's rate should fall within a reasonable range consistent with an industry norm. For example,

relative to other companies [in our industry] our effective tax rate is 16% and most other companies are between 16 and 20. That's kind of the norm in Canada, based on the incentives that are there. So, you know, our tax rate isn't 2%. It's always been between 15 and 20. (C13, Tax Executive, 2014)

All the banks have a target range. If you checked all your conference calls they'll have a target range and it may be 19 to 21 or 20 to 23 or 22 to 23 but they are always in that band. You don't always get there but they are always generally in that band. (C3, Tax Executive, 2013)

Working within industry wide accepted standards of behaviour vis-à-vis effective tax rates was seen by interviewees as a means of protecting their organisations from potential public backlashes, should some of their more byzantine tax arrangements ever come under scrutiny. Within these organizations, effective tax rates were, at times, framed as a form of risk tolerance or risk 'appetite', acting as a quantitative benchmark of what would appear to be seen as acceptable by revenue authorities (Power, 2009). Effective tax rates thus become an essential risk measurement tool. However, this was more common in consumer facing corporations and in public companies that needed to please shareholders. In contrast, business facing corporations and private companies placed much less concern on their effective tax rates. Instead, they emphasized regulatory notions of tax rules and placed greater importance on minimizing the amount of cash taxes payable.

Exceptions such as these notwithstanding, in many cases it was clear that the heightened sensitivity around tax that characterizes the new moral order affords opportunities for reflexive tax accountants to position themselves more prominently in strategic corporate decision making. In two instances, we saw a very clear illustration of how this plays out at the local tax level and

this serves as something of an indicator as to how tax professionals as a whole, may see their role in a broader moral sense. For example, one interviewee expressed that there were times when tax professionals negotiated private agreements regarding property taxes and incentives but that there was some kind of *quid pro quo* by which the company agreed to contribute in some way to the social good of the local community. The fact that these deals are private confers considerable power on the tax professional who serves as an arbiter of moral authority. Although we did not specifically observe this effect at the country level, public reports on the interactions between McDonalds and Luxembourg suggest that it is not unreasonable to imagine this behaviour may in some instances extend to the national level⁹.

Processes of tax planning also operate in a highly isomorphic fashion as corporations look towards the tax behaviour of other corporations or simply see what seems to work, in tax terminology, “what sticks”.

I would say even in my own practice where we do kind of push the boundaries a little bit, you know, you don’t go way overboard, right. You push it a little bit and you try and see if that sticks and if it does, that’s great but you don’t blow everything up for the sake of becoming greedy, if you will (C2, Tax Executive, 2014)

Finally, in response to the uncertainties surrounding the assessment practices of tax authorities, we found a growing negotiated dimension in relations between taxpayers and tax authorities (see also Morrell & Tuck, 2014). This finding was somewhat unexpected since, unlike public relations, where norms would be expected to play a significant role, relations between taxpayers and tax authorities would be expected to be based predominantly or even exclusively on rules, laws and sanctions. Instead, there appears to be an increasing use by tax authorities of more

⁹ Kanter, J. EU Investigates McDonald’s Tax Deal with Luxembourg, *New York Times* (Dec 3, 2015). https://www.nytimes.com/2015/12/04/business/eu-opens-inquiry-into-possible-mcdonalds-tax-breaks-in-luxembourg.html?_r=0

informal risk based mechanisms in an attempt to recoup more tax from what they see as powerful and ‘canny’ customers (Currie et al, 2015; Tuck, 2013). One initiative where this is evident is in risk based audit strategies that rank corporations based on a level of relative risk. The following interviewee describes how his organization has responded to this new ranking schema:

Canada has adopted this risk-based audit approach now, where they basically rank tax payers based on a number of factors and, based on your ranking, they sort of set their audit scope and how they deal with you. We went through that process with our auditors and, you know, I think we were able to work with them and understand what factors they look at, what could we do different to lower our rating and they were actually open in communicating that. (C13, Tax Executive, 2014)

In Canada, some interviewees commented on even more extreme approaches being taken by the CRA, including meeting directly with senior executives outside of the tax function and with boards in an attempt to shame those individuals over the corporation’s tax behaviour, although it is not clear whether this is having the desired effect:

what we are talking about here with this transparency and these public discussions and even the CRA formal ‘let’s go and meet your directors’, I don’t get a sense other than angering tax executives it’s not having any impact on how we operate or how we operate within our company. (C4, Tax Executive, 2014)

These new forms of cajolery by tax authorities appear to be a result of the failure of existing regulatory approaches, and the belief that corporations are not providing sufficient information regarding their activities. This is despite tax authorities having, at least in theory, complete and unfettered access to information.

Overall, in addition to new rules and regulations, tax practice is clearly also driven by moral imperatives that exceed the letter of the law. These moral imperatives have moved quicker than regulations have in many ways, and soft law initiatives such as BEPS should be viewed as an attempt to close the gap between the two. However, the complexity and difficulty of implementing regulation in this area still leaves significant room for manoeuvre for actors in the

field of tax practice. Indeed, while in one sense new moral demands are being placed upon corporations in terms of processes of risk management by adhering to things such as effective tax rates or risk audit strategies, in another sense wider public concerns that corporations pay their ‘fair share’ of tax are viewed by tax advisors through the more mundane and soluble prism of reputational risk. In this respect, the commercial and moral logics that BEPS brings into potential conflict are effectively hybridized and made complementary by tax professionals. Thus, what appears to be a threat and potential disruptor to tax practice ends up recast as an opportunity for reflexive professionals.

3. The rise of tax governance

Further opportunities for professionals to capitalise on newly established moral logics in the tax field are evident in the way in which tax governance has emerged as a new practice category. Decisions about what is a ‘right amount’ of tax to pay or what is ‘acceptable’ in the context of public opinion cannot be made without recourse to the highly specialized knowledge base and shared meaning system that tax professionals as a whole are privy to. Our findings show that new elements are being introduced into the frames through which tax professionals have long understood their world. What is changing is how in-house tax professionals interact with senior executives such as the CEO and board members who don’t possess the “crucial know how” (Viale et al, 2017: 26) required to decipher tax problems. Some of the more significant actions under BEPS such as those concerning interest deductions and transfer pricing rest on highly technical points of understanding and interpretation that are beyond the knowledge of senior executives and board members. Consequently, tax consciousness is having to be diffused throughout organizations and in-house tax professionals are playing increasingly prominent roles in corporate decision making. For example, one tax partner in a Big 4 firm commented that

I'm hearing from a lot of VPs of tax that they're asked to be at the board meetings whereas before they wouldn't have been asked to be there. (P30, Tax Partner, 2015)

Another similarly noted:

And I would say that I know of companies now that, part of their quarterly board meetings, involves more discussion with a tax department with regards to the type of transaction. (C26, Tax Consultant, 2014)

We observed less of this effect in the private company setting, but this appeared more related to the fact that tax directors and CFOs already carried very significant authority with boards in those companies.

On the specific issues that BEPS has introduced, such as country by country reporting, in-house tax professionals are finding that they can no longer operate in relative isolation from the rest of the organization:

[country -by country reporting] is not something tax alone can do. This is an IT responsibility. So you need to have C-Suite involved to be able to get the projects approved and tax is not the only thing going on in organizations and so in terms of priority lists and timing like it's got to get started now for large complex organizations to actually be able to do that. (P7, Tax Partner, 2014)

As alluded to above, professionals at the government level also indicated that they are increasingly speaking to corporate boards rather than only to corporate tax departments about tax planning issues. However, this was explained to us as a function of tax departments putting up resistance to attempts to garner more information:

We have companies that resist our every effort to get information, right, so we've elevated that discussion...because as you elevate within the organization you see more concern around them... They [boards] are happy to know, well for the most part, that their tax department is putting up resistance (G31, Director, 2016).

In this respect, governmental bodies elevate the discussion to board level in order to bypass what they view as recalcitrant behaviour by corporate in-house tax professionals. This recalcitrance

can be interpreted as a skillful and reflexive (Suddaby et al., 2016) attempt to maintain opacity around the technical-cognitive resources that tax departments possess. However, circumventing tax professionals has the paradoxical effect of placing more power in their hands, as the complexity of tax practice is something that few board members have the cognitive expertise to adequately comprehend.

I think the CRA seems to think that it's the board will look at tax plans, they'll look at tax transactions and they'll never have the time to do that because they are just about high-level governance. (C3, Tax Executive, 2013)

Our interviews indicated that, to manage these interactions between in-house professionals and board members, more formal processes are being introduced to bridge knowledge gaps and meetings are occurring on a more regular basis. These processes include the formal adoption of 'risk management' policies, attempts to educate senior management on the tax aspects of the business and approval processes over tax transactions.

I would say the approval process has changed somewhat but it's more formalized now to a point where we've actually adopted a tax risk management policy and we have a framework within which we work and we actually have approval thresholds and it's all specified. So, you know, for any transaction over a hundred million we bring in one other person signing off on it and if it's greater than that then it goes to the CFO and we go through it with him. So we do have a formal process. (C13, Tax Executive, 2014)

Formal processes for managing risk in other domains have been shown to be associated with deeper failures in managerial intelligence (Power, 2009). This would appear to resonate with the proliferation of 'tax risk management' as a practice category that eludes adequate comprehension by the C-suite. As such, tax professionals within corporations and professional firms are designing their own procedures to mitigate risks, presenting themselves as indispensable. These changes are having a significant effect on how things are done, the organizing logics of tax professionals and the tax function within the organization. Tax professionals within organisations

are now having a much greater influence on corporate strategy than they ever were before.

Simultaneously, in-house tax professionals at times employed risk to *downplay* their influence on corporate strategy and mitigate their responsibility. Interviewees mentioned a proliferation of risk mechanisms or filters, including approvals by Chief Risk Officers or risk committees or the need to fit within risk frameworks or risk codes before actions could be taken:

I think I'd be responsible for explaining my assessment of the level of the risk to the organization. I think the decisions around whether to take those risks would be a combination of, depending on what it is, we have a Chief Risk Office. We have a CFO. The board has a Risk Committee who is responsible for managing risk. (C11, Tax Executive, 2013).

It is unclear whether these mechanisms are actually successful in managing risks or are, as Power observes, “more about creating organizational rhythms of accountability and auditable representations of due process” (Power, 2009: 854).

While in-house tax professionals may point to these risk mechanisms, those advancing the ‘tax risk management’ agenda are primarily accountants and lawyers who have a very specific skill set; the complexities of tax can only ever be understood by even sophisticated and highly intelligent executives to a limited extent.

[O]ur particular audit committee has no accountants and nobody of any kind of tax background. If you have no tax background, no accounting background of significance, it's very difficult to ask informed questions or make informed statements. (C13, Tax Executive, 2015)

While tax professionals spend time laying out a corporation's tax plans to senior executives and boards, ultimately the decisions regarding tax planning fall back upon a limited number of individuals within the organization (see also Mulligan and Oats, 2016). Although big decisions, such as inversions or relocating headquarters, are still the preserve of corporate boards, to the

extent that the execution of these goes awry, lines of responsibility are drawn back to the tax department. This environment leads to a situation where overly aggressive behaviour will end up, not only in tax court and perhaps with regulatory sanctions, but also with broader moral judgements in the court of public opinion that could have much more serious consequences for the corporation. Put simply, in-house tax professionals may have lots of tools at their disposal, but they need to think long and hard before they put them to use.

I've had a few internal discussions with people and it's never bad to challenge yourself and say 'are you comfortable now watching what's going on? Are you comfortable in your skin that you are okay with what you are doing and as a fiduciary to your company, can you look your directors in the eye and say listen we really shouldn't be worrying about this' (C4, Tax Executive, 2014)

In summary, tax professionals' work has been disrupted in recent years by tax avoidance scandals and institutional initiatives such as BEPS. In-house tax professionals now find themselves shouldering the double burden of: interpreting complex tax legislation (harnessing their technical-cognitive resources); and, making decisions in terms of what is a socially acceptable tax structure to engineer (responding to moral imperatives), receiving little in the way of guidance from corporate boards. This leads to a view of tax work as, firstly, technical to the point of impenetrability and, secondly, essentially moral in nature, as those who have putative decision making power in terms of aggressive tax planning or otherwise are almost completely reliant upon tax professionals to make those decisions for them. Therefore, morality is not just an outcome of tax work, tax is increasingly deeply imbued with it.

Discussion and Conclusions

This study has sought to understand how changing public perceptions about taxation are, directly and indirectly, impacting tax practice. Our research conceived of tax as a social practice or, in

conceptual terms, as an institution underpinned by “collective cognitions and shared assumptions” (Suddaby, 2013: 381). The research also directly engaged tax actors. In particular, the fieldwork benefited from a high level of access to senior corporate tax practitioners and is recent; both of these attributes cause this study to be distinct from prior work.

We found that participants felt that their professional domain was under intense pressure and that practice was changing as a result. Corporate tax is clearly an arena that has been subject to significant disruption in recent years. The OECD BEPS project has introduced multiple logics, or institutional complexity, to the field of tax. As one tax professional announced at a BEPS conference in 2015: ‘anyone who does not believe that BEPS is going to have a far-reaching impact has clearly been living on another planet for the last 5 years!’ Thus, even though the OECD itself does not have legal powers, national governments are expected to legislate in accordance with OECD guidance and a potential path from ‘soft’ law to ‘hard’ law is clear to see. What was already a complex arena has become less so in some ways, with greater regulatory precision and anticipated greater international harmonization, but actors are still left with significant space within which to manage and manipulate their professional environment (DiMaggio, 1991; Suddaby, 2013). Exploring how tax professionals have responded to this institutional flux permits us to make a number of contributions to our understanding of how professional projects develop during times of institutional change.

Firstly, our analysis shows how wider processes of institutional change at the field-level are connected to professionals repositioning themselves in the social space. Kodeih and Greenwood (2014) have shown that circumstances of institutional complexity provide *organizations* with the opportunity to enhance their status within surrounding fields. We show that *professional groups/projects* are afforded similar opportunities when largely exogenous shocks impact upon institutions. In this respect, professionals transform wider changes at the

organizational field level into resources that help advance professional projects (DiMaggio, 1991). Heightened public awareness surrounding corporate tax contributions to national exchequers has fed through into corporate boardrooms in the form of increasing high-level scrutiny over tax planning. This has created opportunities for in-house tax professionals to play a more prominent role in corporate strategizing *per se*. Even where tax authorities seek to bypass corporate tax departments and go straight to corporate boards, this creates an opening for reflexive tax accountants with ‘entrepreneurial social skill’ (Suddaby et al., 2016) to enhance their prominence within the organization, as many corporate board members are perceived to be ill-equipped to deal with complex corporate tax issues without the aid of expert advice. The reflexivity that tax professionals exhibit here is more than ‘superficial’. ‘Superficial reflexivity’ is evident when actors exhibit only a technical awareness of the issues at play in surrounding fields (Suddaby et al, 2016). In the case presented above, tax professionals were all fully aware of the changing moral zeitgeist and the opportunities and constraints that this presented for them, both as individuals and as a professional group. In many ways, this throws into relief the weakness of soft law approaches to professional regulation. BEPS has a far-reaching intent to renegotiate the tax contract between corporations and society, but professional groups actively work, in various ways, to transform the BEPS agenda into a self-serving expansion of professional boundaries.

Secondly, we draw attention to the way in which different professionals are differentially affected by transnational institutional change, responding directly to Suddaby and Viale’s (2011) call for more research looking at how “field-level processes of institutionalization attend to some characteristics of individual professionals and not others” (431). In some respects, corporate in-house tax professionals experience BEPS in a very different way from their external advisors in large accounting or law firms. Although all of these actors can be thought of as constitutive of the same professional tax project, internal divisions became clear when discussing the impact of

BEPS on tax planning. In this respect, the increased centrality of in-house tax professionals to corporate strategizing has not come without costs for these individuals, who were more likely to express despair at the demands that BEPS would place upon them and whether or not they would realistically be able to comply with those demands. In contrast, external tax advisors, although vexed by BEPS, were much more clinical in their response and focused on how their clients would need to adjust to meet BEPS; presumably this reflects the attendant opportunities that would emerge for them to advise clients on what has become an increasingly complicated area of practice. Further evidence of this can be seen in the significant attention the Big 4 firms have paid to BEPS and to keeping clients aware of BEPS developments¹⁰. In this respect, external tax advisors can be characterized as reflexive mediators, not merely between organizations and institutions (McPherson and Sauder, 2013), but between their corporate clients and society *per se*. Furthermore, that different types of tax professional are being heterogeneously impacted by BEPS was evident from the symbolic boundaries (Lamont, 1992) that were drawn between them. In-house tax professionals, many of whom had prior public accounting experience, could be quite critical of the major public accounting firms for having institutionalized aggressive tax planning practices in the first place which, in their eyes, have prompted regulators to take action through BEPS, constraining their discretion and placing upon them unreasonable demands. Thus, what is an opportunity for one professional faction can become, to some extent, a burden for the other. Although equally one could argue that the despair expressed over the burden of BEPS is a form

¹⁰ One example of this can be seen in KPMG's "Understanding and preparing for BEPS" document, which states: "Knowledgeable and experienced professionals from KPMG LLP (KPMG) can work with you to help assess BEPS readiness, anticipate changes in the global tax landscape, proactively address your company's global tax planning needs, and assist in developing an effective communication strategy to keep stakeholders informed of potential impacts to the company" (KPMG, 2015): <http://www.kpmg-institutes.com/content/dam/kpmg/taxwatch/pdf/2016/kpmg-beps-services-readiness.pdf>

of ‘faux outrage’, masking the more strategic and reflexive manoeuvres that in-house actors evince elsewhere, such as in the corporate boardroom.

Thirdly, we draw attention to the different types of resources that professionals use in order to reposition themselves during times of institutional change. Seminal work in this area has usefully highlighted the importance of social capital (Suddaby and Viale, 2011) as well as skill (Fligstein, 2001), in enhancing professional projects. We show here the fundamental importance of technical-cognitive resources in professional repositioning. Technical-cognitive resources are evident in the form of the embodiment of highly complex tax knowledge, where tax professionals are seen as “holders of crucial know-how” (Viale et al., 2017: 26). The mechanics of tax planning in modern day corporations are so byzantine – partly a function of complicated regulation, partly a function of the complicated legal arrangements of corporations themselves – that most corporate board members struggle to meaningfully understand what it is that their own organization does vis-à-vis tax arrangements. Indeed, the consistent message that the tax profession has articulated about BEPS and increasing complexity, in both public fora and professional literature, could be seen as a signalling mechanism – a message sent to corporate boards that tax accountants and lawyers are even more indispensable to corporate decision making than they were hitherto. In this respect, not only do tax professionals have a valuable pool of technical-cognitive resources from which to draw, they skillfully put those resources to use.

Central to this increased importance of in-house tax professionals to the corporate decision-making process is risk management. Taxation has moved up the risk management hierarchy; no longer simply a cash cost of losing in tax court, taxation has become a critical variable in the organization’s reputational risk equation. While this new importance of tax risk within the organization has enhanced the status of tax professionals, it has also been employed by tax professionals to avoid or mitigate their responsibility with regards to such corporate decision

making. Tax professionals point to a plethora of risk management mechanisms, outside of their full control, through which decision making must flow. As BEPS has taken shape, tax risk has become increasingly diffused throughout the organization, with human resource or information technology departments having an ever-greater responsibility in determining permanent establishment or transfer pricing issues.

In turn, this leads to a new understanding of tax, not merely as a practice that has moral implications, but as a practice that is more deeply imbued with morality than has hitherto been recognized. However, morality is not merely something that is thrust upon tax professionals as a whole, but something that is used skillfully as a symbolic resource by them with which to advance their own professional project. Specifically, moral and technical-cognitive elements combine in contemporary tax practice in ways which create both demands and opportunities for tax professionals. This combining of emerging norms and established technical expertise was evident in areas such as the measurement of - and strategic adherence to - effective tax rates, whereby the ‘socially acceptable’ is rendered calculable and knowable via recourse to professional expertise. Tax professionals have not been trained to think about what is right and wrong so much as what is within the letter of the law, yet they are now forced to deliberate on what kind of number or percentage might be considered socially acceptable. In this respect, norms become progressively inscribed into the technical-cognitive frames of tax professionals.

Such attempts at bringing the socio-ethical into the technical realm are part of a wider proliferation of tax risk management discourse. ‘Tax risk management services’ have emerged in recent years as a response to the past excesses of tax professionals, external advisors specifically. In other words, solutions to the moral outrage engendered by the aggressive tax planning activities of large corporations are proffered by the very same actors who institutionalized aggressive tax planning in the first place. As Power (2009) notes, risk is one way to map ethical

limits (854). It is through the prism of risk, which is measured in a technocratic fashion and therefore rendered soluble, that in-house tax professionals have been disrupted in a technical-cognitive sense, effectively being left to do the moralizing on behalf of senior corporate decision-makers. For example, many of our interviewees were well aware of the impossibility of explaining to their clients or senior management what the organizational tax options were without biasing their decisions. It is in this respect – where the technical subsumes the ethical – that tax professionals should be considered as “morally significant actors” (Suddaby, 2013: 381).

Understanding how tax professionals respond to institutional change and complexity is important because corporate tax has significant implications for wealth distribution and the capacity of the nation state to provide public services. Future research could look more closely at the socio-economic implications of state tax policy and the role of the tax profession in influencing that domain. Further studies could also usefully examine in more detail the process by which BEPS pronouncements have been made, paying particular attention to the way in which powerful professional actors might have influenced the agenda to their advantage from the outset. In the present paper, we have presented BEPS as something of an exogenous shock to the tax profession, albeit suggesting that tax professionals as a whole will have played some role in its development, but previous studies have shown how regulation is endogenized into professional projects (Bozanic et al, 2012; Mulligan and Oats, 2016). It may be that this is also the case here, and that tax professionals are not merely responding advantageously to external developments, but are much more deeply involved in shaping those external developments in the first place. This would be a question for a different study.

APPENDIX 1

The OECD BEPS Action Plan

The Final BEPS reports were released in 2015. This appendix summarises the respective Actions,
as outlined in the OECD/G20 Base Erosion and Profit-Shifting Project: 2015 Final Reports
Executive Summaries document.

ACTION ITEMS	ISSUE	SUMMARY
Action 1 Digital Economy	ADDRESSING THE TAX CHALLENGES OF THE DIGITAL ECONOMY	Action 1 addresses the challenges that arise as a result of the digital economy. The report specifically notes that the digital economy cannot be ring-fenced from the broader economy from a tax standpoint and that the digital economy tends to exacerbate existing BPES challenges. The Action h considers both direct and indirect taxation. A subsequent report is expected by 2020.
Action 2 Hybrids	NEUTRALISING THE EFFECTS OF HYBRID MISMATCH ARRANGEMENTS	Action 2 recommends rules that prevent taxpayers from using hybrid entities and instruments to artificially exploit differences in tax treatments between countries. Such activities are undesirable from an economic efficiency and fairness standpoint and potentially result in double non-taxation.
Action 3 CFC Rules	DESIGNING EFFECTIVE CONTROLLED FOREIGN COMPANY (CFC) RULES	Action 3 sets out recommendations described as “building blocks” to strengthen controlled foreign company (CFC) rules and ensure that corporations do not shift income into foreign subsidiaries.
Action 4 Interest Deductions	LIMITING BASE EROSION INVOLVING INTEREST DEDUCTIONS AND OTHER FINANCIAL PAYMENTS	Action 4 explores best practices for ensuring taxpayers do not shift income via interest expense. The report notes that multinational groups have considerable potential to engage in base eroding actions by manipulating intra-group financing arrangements
Action 5 Harmful Tax Practices	COUNTERING HARMFUL TAX PRACTICES MORE EFFECTIVELY, TAKING INTO ACCOUNT TRANSPARENCY	Action 5 revamps the work on harmful tax practices. It focused heavily on transparency and ensuring there is substantial activity in preferential regimes. Some 43 preferential regimes were reviewed.

	AND SUBSTANCE	
Action 6 Treaty Abuse	PREVENTING THE GRANTING OF TREATY BENEFITS IN APPROPRIATE CIRCUMSTANCES	The Action 6 report notes that treaty shopping is one of the most critical elements of BEPS. The report is directed at preventing treaty abuse through mechanisms such as limitations on benefits provisions in tax treaties.
Action 7 Permanent Establishment Status	PREVENTING THE ARTIFICIAL AVOIDANCE OF PERMANENT ESTABLISHMENT STATUS	Action 7 addresses the definition of permanent establishment (PE) in order to prevent taxpayers from artificially circumventing PE status.
Actions 8-10 Transfer Pricing: Intangibles Risks & Capital High Risk Transactions	ALIGNING TRANSFER PRICING OUTCOMES WITH VALUE CREATION	Actions 8 – 10 address the concern that transfer pricing has been manipulated such that income allocation outcomes are misaligned with value creation activities. These Actions focus on intangibles, allocation of risk and other high risk areas.
Action 11 BEPS Data Analysis	MEASURING AND MONITORING BEPS	Action 11 is focused on recommendations for collecting and analysing data on BEPS activity.
Action 12 Disclosure of Aggressive Tax Planning	MANDATORY DISCLOSURE RULES	Action 12 emphasises transparency and contains recommendations regarding mandatory disclosure rules.
Action 13 Transfer Pricing Documentation	TRANSFER PRICING DOCUMENTATION AND COUNTRY-BY-COUNTRY REPORTING	Action 13 is directed at transfer pricing documentation. It includes a template for reporting income on a country-by-country basis
Action 14 Dispute Resolution	MAKING DISPUTE RESOLUTION MECHANISMS MORE EFFECTIVE	Action 14 recognises that correcting base erosion should not result in double taxation of income. Accordingly, this Action is focused on ensuring effective mechanisms exist for resolving tax disputes between countries.
Action 15 Multilateral Instrument	DEVELOPING A MULTILATERAL INSTRUMENT TO MODIFY BILATERAL TAX TREATIES	Action 15 addresses the mechanics of implementing the BEPS proposal changes within the context of a multitude of bilateral tax treaties. Implementing the changes through one multilateral instrument enables the changes to be implemented rapidly and without waiting on the renegotiation of existing treaties.

APPENDIX 2

KEY DATES AND EVENTS SURROUNDING THE DEVELOPMENT OF BEPS

Key Dates	Events	Description
2000	Global Forum on Transparency and Exchange of Information for Tax Purposes	Founded under the auspices of the OECD to address tax evasion, tax havens, offshore financial centres, tax information exchange agreements and double taxation. Restructured in 2009 to include non-OECD countries.
2002	Sarbanes-Oxley Act of 2002	Enacted as a reaction to corporate and accounting scandals such as Enron and Worldcom. Sought to create improved oversight, corporate responsibility, and enhanced disclosure and transparency
2002	Forum on Tax Administration	Established by the OECD's Committee on Fiscal Affairs to encourage cooperation between revenue authorities and enhance tax administration practices.
2006	Third Meeting of the OECD Forum on Tax Administration – Seoul Declaration	Highlighted the increasingly aggressive nature of corporate tax practices, and serious compliance and fairness issues.
2007-2008	Financial Crisis	A crisis in the subprime mortgage market in the US led to a global international banking crisis that froze credit markets and resulted in a severe economic recession. Public anger was directed towards specifically the financial industry and more generally broader institutions in society.
2011	Occupy Wall Street	Global protest movement to direct attention to social and economic inequality, greed, corruption and the influence of corporations on governments.
2012	G 20 Summit	G20 reaffirms support for the work of the OECD to develop a framework to strengthen tax transparency and exchange of

		information that eventually would become BEPS.
2012-2013	UK Media reports surrounding Starbucks and investigations by the Commons public accounts committee	Reuters publishes its “Special Report: How Starbucks avoids UK taxes” leading to questioning by the UK Public Accounts Committee of MNCs such as Starbucks, Amazon and Google over their UK tax activities and the publication of a report by the committee criticizing the HMRC allowing companies to pay little or no corporation tax.
2013	OECD publishes BEPS Background Report and Action Plan	The report notes that base erosion and profit shifting is major concern and risk to tax revenues, tax sovereignty and tax fairness. G20 has requested a report on the progress of the OECD’s work for February 2013. July 2013 delivers OECD Action Plan to G20.
2013	G20 Summit	G20 endorses OECD’s work to address cross border tax problems that under public finances and people’s trust in fairness of the tax system by changing rules to tackle tax avoidance, harmful tax practices, and aggressive tax planning.
2015	OECD/ G20 publish Final Report and 15 Action Items	OECD and G20 countries agreed to a comprehensive package of measures including minimum standards in the areas of treaty shopping, Country-by-Country reporting, fighting harmful tax practices and improving dispute resolution to revision of existing standards in other areas.

APPENDIX 3

Summary of Documents and Participant Observation

Selection of Newspaper Articles	Title	Date	Source
	European commission to probe Amazon's tax status in Luxembourg	8, October 2014	The Guardian
	Amazon to begin paying corporation tax on UK retail sales	23, May 2015	The Guardian
	ACCA research disputes corporate tax base erosion	01, April 2014	Accountancy Age
	Brussels to announce measures against corporations' 'sweetheart' tax deals	16, June 2015	The Guardian
	Ireland to Scrap 'Double Irish' Tax Loophole	14, October 2014	CFO.com
	Irish to end the tax loophole that angered the regulators	15, October 2015	International New York Times
	Multinationals brace for tax overhaul	16, April 2014	The Globe and Mail
	UK to stymie EU plans to combat multinational tax avoidance	26, June 2015	Accountancy Age
	Walmart has \$76 billion in overseas tax havens, report says.	17, June 2015	The Globe and Mail
	Starbucks and Fiat sweetheart tax deals with EU nations ruled unlawful	21, October 2015	The Guardian
	After Outcry, Ireland Adjusts Its Corporate Tax Draw	16, November 2015	New York Times
Tax Journal Articles	Policy Forum: Editors' Introduction – Addressing Base Erosion and Profit Shifting	2014	Canadian Tax Journal
	Policy Forum: The Policy Underpinnings of the BEPS Project – Preserving the International Corporate Income Tax?	2014	Canadian Tax Journal
	Policy Forum: BEPS One Year In-Taking Stock	2014	Canadian Tax Journal
	Reputational Risk: A New Challenge in Transfer Pricing Compliance	2013	Tax Management International Journal

Studies and Conferences	Responsible tax and BEPS – assessing the reaction among MNCS: Summary Global Survey Results	May 2014	Deloitte
	OECD's BEPS initiative – multinational survey results	September 2014	Deloitte
	Deloitte OECD's Base Erosion and Profit Shifting (BEPS) initiative: Results of second annual multinational survey	September 2015	Deloitte
	Corporate tax evasion, avoidance, and competition: analyzing the issues and proposing solutions	November 2013	Chartered Professional Accountants Canada
	Co-operative Compliance: A Framework From Enhanced Relationship to Co-operative Compliance	2013	OECD
	EY Center for Board Matters: Board Matters Quarterly	September 2015	Ernest & Young
	Canadian Tax Foundation: BEPS Symposium: A Canadian Perspective	January 2015, 8 hours	International Fiscal Association and Canadian Tax Foundation, Toronto, Canada
	Deloitte-Waterloo Tax Conference	June 2015, 4 hours	Deloitte and the University of Waterloo, Toronto, Canada
	Oxford University Centre for Business Taxation: BEPS and UK tax policy: co-operation or competition?	November 2015, 8 hours	Oxford University and OECD, London, UK
	Canadian Tax Foundation: International Tax Planning for Canadians in a World of Changing Rules	February 2016, 8 hours	Canadian Tax Foundation, Toronto, Canada
	Oxford University Centre for Business Taxation: The Effects of Business Taxation on Economics and Social Welfare: New Insights from Tax Return Data	March 2017, 7 hours	Oxford University, UK

TABLE 1**Interviewees**

Unique Alpha-Numerical Identifier	Date	Position	Industry/ Public Accounting	Country	Public or Private	Size
C1	January 2014	Tax Executive	Industry	Canada	Public	Large
C2	January 2014	Tax Executive	Industry	Canada	Private	Large
C3	November 2013	Tax Executive	Industry	Canada	Public	Large
C4	January 2014	Tax Executive	Industry	Canada	Public	Large
C5	February 2014	Tax Executive	Industry	Canada	Public	Large
P6	September 2013	Tax Partner	Public Accounting	Canada	Private	Big 4
P7	March 2014, August 2016	Tax Partner	Public Accounting	Canada	Private	Big 4
P8	March 2014	Tax Partner	Public Accounting	Canada	Private	Big 4
P9	March 2014	Tax Partner	Public Accounting	Canada	Private	Big 4
C10	March 2014	Tax Executive	Industry	Canada	Public	Medium
C11	December 2013	Tax Executive	Industry	Canada	Public	Large
C12	August 2015	Tax Executive	Industry	Canada	Public	Large
C13	February 2014	Tax Executive	Industry	Canada	Public	Large
C14	April 2015	Tax Executive	Industry	Canada/ US	Public	Large
C15	July 2014	In-house Tax Counsel	Industry	UK/US	Public	Medium
P16	August 2015	Tax Partner	Public Accounting	China	Private	Big 4
P17	August 2015	Tax Director	Public Accounting	China	Private	Big 4
P18	August 2015	Tax Senior Manager	Public Accounting	China	Private	Big 4
P19	August 2015	Tax Senior Manager	Public Accounting	China	Private	Big 4
C20	May 2014	Tax Executive	Industry	US	Public	Large
P21	May 2014	Tax Partner	Public Accounting	US	Private	Regional
C22	June 2014	Tax Executive	Industry	US	Public	Large
C23	May 2014	CFO	Industry	US	Private	Small
C24	May 2014	Tax Executive	Industry	US	Private	Large
C25	May 2014	Tax Executive	Industry	US	Public	Public
C26	May 2014	Tax Consultant	Public Accounting	US	Private	Small
C27	July 2014	CFO	Industry	US	Private	Small
C28	May 2014	Tax Executive	Industry	US	Private	Large
C29	May 2014	Tax Executive	Industry	US	Public	Large 500
P30	January 2015	Tax Partner	Public Accounting	US	Private	Big 4
G31	November 2016	Director	Government	Canada	Government	Large

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